

DEPARTMENT OF THE NAVY OFFICE OF THE GENERAL COUNSEL 1000 NAVY PENTAGON WASHINGTON, D.C. 20350-1000

AGC(E)03140 December 12, 2003

MEMORANDUM FOR DEPARTMENT OF THE NAVY INVITEES

Subj: CENTENNIAL OF FLIGHT RECEPTION

The First Flight Centennial Foundation and Northrup Grumman will sponsor the Centennial of Flight Reception at the Wright Brothers National Memorial in Kill Devil Hills, North Carolina, on December 16, 2003. This reception, held in conjunction with the Centenial of Powered Flight Celebration, will be attended by representatives from the military departments, other Federal agencies, Congress, and business leaders interested in the future of U.S. aerospace activities.

The Department of the Navy has determined that attendance by Department of the Navy personnel at this event constitutes an exception under 5 C.F.R. 2635.204(g)(2). This memorandum constitutes a finding pursuant to 5 C.F.R. 2635.204(g)(3)(ii) of agency interest in the Centennial of Flight Reception. Accordingly, Department of the Navy personnel whose duties do not substantially affect the sponsors of the event may accept free attendance at this event and the provision of food, refreshments and entertainment furnished to all attendees as an integral part of the event. They may not, however, accept travel expenses or lodgings personally.

Department of the Navy employees whose duties may substantially affect the sponsors should seek an individual determination pursuant to 5 C.F.R. 2635.204(g)(3)(i) regarding this event from their local ethics counselor.

David W. LaCroix

Assistant General Counsel (Ethics)